

Kesich, John
Page 1 of 2

EIS for Tucson Electric Power's proposed 345 kilovolt powerline

Forwarded by Susan Kozacek/R3/USDAFS
on 10/16/2003 05:34 PM
Kesich@npacc.net
10/11/2003 08:30 AM
To: skozacek @fs.fed.us
Cc:

Subject: EIS for Tucson Electric Power's proposed 345 kilovolt powerline

Ms. Sue Kozacek
Coronado National Forest
Federal Building, 300 west Congress
Tucson, AZ 85701

Dear Ms. Kozacek,
Please withdraw the current draft Environmental Impact Statement for Tucson Electric Power's proposed 345 KV powerline. This draft EIS is flawed. It assumes that the new powerline should be used to export power to Mexico rather than presenting alternatives which restrict use to providing power to Santa Cruz County - this may be good for the company's bottom line but I do not see that it serves the public interest.

- 1
- 2 I would also like to see alternatives which rely on distributed power generation - solar, wind, cogeneration - rather than simply stretching more wires across our landscape.
One alternative I would favor is scaling back the project to the backup line which ACC originally ordered built and running that through the existing existing powerline corridors along I-19.
- 3 This makes much more sense to me than marring the Coronado National Forest so that TEP can export power to Mexico.

Comment No. 1

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system..." It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 2

Alternative or renewable power supply methods do not meet TEP's proposal and are thus not evaluated in this EIS (see Section 2.1.5).

Comment No. 3

A smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal and, therefore, is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

The commentor's suggestion of building a line adjacent to the existing transmission line in the I-19 corridor was considered but eliminated from further analysis in the EIS (see Section 2.1.5).

Kesich, John
Page 2 of 2

4 --- TEP's proposed "Western Route" and alternative "Crossover Route" would carve through some of the most remote and wild areas in Southeast Arizona, forever scarring the beautiful and irreplaceable landscape of the Tumacacori Highlands. This area contains several roadless areas as well as a citizen's proposed Wilderness area home to black bears, Mexican spotted owls, lesser-long nosed bats and peregrine falcons as well as lesser known species such as the Sonora chub, Mexican vine snake, elegant trogon and the Gentry indigo bush. A jaguar was sighted in this area only two years ago.

5 The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline designed to export power to Mexico.

6 The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

7 The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.

Sincerely,
 John Kesich
 RR 2 Box 168a
 Millerton, Pennsylvania 16936

Comment No. 4

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Comment No. 5

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system..." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).


Comment No. 6

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 7

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal and, therefore, is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Kinkead, Margaret
Page 1 of 1



Margaret R. Kinkead
P.O. Box 1448
7 Cerro Pelon
Tubac, AZ 85646-1448

August 18, 2003

Dr. Jerry Pell, Manager
Office of Electric power Regulation
Fossil Energy
U.S. Department of Energy
Washington, D.C. 20585

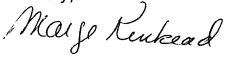
Dear Dr. Pell:

Thank you for the draft of the Environmental Impact Statement for the Tucson Electric Power Company's Sahuarita - Nogales Transmission Line.

1 | In reading through the report on the CD I could not find where you addressed the safety issues in relationship to the natural gas line and to the distribution station that is on the property at 2258 Rusty Spur in Tubac.

2 | In two places it mentions that the Central Corridor will pass north but close to three houses on Aliso Springs Road. Does it vary from the pipeline through Cerro Pelon by the Rusty Spur properties? If it does not, you need to add five more houses as well as the distribution station to that route since the pipeline is on those properties.

Thanks for listening to us and doing a thorough job.

Sincerely,

Margaret R. Kinkead

Comment No. 1

Section 4.10 of the Final EIS has been revised to include discussion on safety considerations for collocating natural gas pipelines and transmission lines. TEP has consulted with EPNG about the proposed project, and TEP would have detailed discussions with EPNG regarding safety issues of siting the proposed transmission line near the distribution station once an exact location for the structures is determined.

A minimum distance of 100 ft (30 m) would be maintained between any of the proposed transmission line structures and the edge of the existing EPNG pipeline ROW, in compliance with the Amended Certificate of Environmental Compatibility issued to TEP on October 29, 2001, by ACC (see Section 4.10 of the EIS). As shown in Table 10-2 of the Final EIS, the Federal agencies consulted with EPNG regarding safety requirements, and EPNG concurred that the ACC's requirement is adequate.

Comment No. 2

The study corridor for the Central Corridor would stay along the pipeline ROW in the area cited by the commentor. Section 3.1, Land Use, of the Final EIS has been modified to include the five additional houses and the distribution station along the Central Corridor.

Kinkead, Marge
Page 1 of 1

From: Marge Kinkead [wmkinkead@earthlink.net]
Sent: Tuesday, September 30, 2003 7:28 PM
To: Pell, Jerry
Subject: power lines

Dr. Pell:

I missed the meeting in Nogales because I did not hear about it until after I had other plans.

1 I wanted to address my continuing concerns about the safety of putting the pipeline along the gas line near the distribution station on Ed and Linda Wood's property at 2258 Rusty Spur in Tubac. Since these hearings have been going on the uncontrolled venting of the gas line has ceased. But El Paso Gas has told us that it is necessary to vent and test the distribution point and the line itself on a regular basis. It is this venting near 45 K power lines that seems to me to be unsafe.

If I had been able to come to the meeting, I would have voiced these concerns at the meeting. This safety issue was not addressed in the Draft of the Environmental Impact Statement. I hope that it will be addressed in the final report.

Marge Kinkead
P.O. Box 1448
7 Cerro Pelon
Tubac, AZ
520 398 2364

Comment No. 1

Refer to the response to Comment No. 1 in the previous submittal from Margaret Kinkead.

Kinkead, Marge
Page 1 of 1

Environmental Impact Statement for the proposed Tucson
Electric Power lines into Mexico

From: Marge Kinkead [SMTP:wmkinkead@earthlink.net]
To: Pell, Jerry
Cc: marshall@magruder.org

Subject: Environmental Impact Statement for the proposed
Tucson Electric Power lines into Mexico
Sent: 10/13/2003 7:06 PM
Importance: Normal

Margaret R. Kinkead
P.O. Box 1448
7 Cerro Pelon
Tubac, AZ 85646-1448
520 398 2364

Re: Environmental Impact Statement for the proposed Tucson
Electric Power lines into Mexico

Dear Dr. Pell:

Marshall Magruder suggested that I rephrase my recent letter
to you so that it was in a question form. Where in the draft of
the Environmental Impact Statement were the safety issue
addressed?

1

How close can the 345 K power lines safely come to the
distribution station on the property at 2258 Rusty Spur, Tubac,
AZ which is vented for testing on a regular basis? I am
anxious to receive your answer.

Marge Kinkead

Comment No. 1

Refer to the response to Comment No. 1 in the first submittal from
Margaret Kinkead.

Kroening, Nancy
Page 1 of 1

Oct 4, 2003

Jerry Pell, Sr. Env. Scientist/Fossil Energy
FE-27 U.S. Dept. of Energy Forrestal Bldg.
Room 46-025
Washington D.C. 20585

Dear Mr. Pell:

These comments are regarding Tucson Electric Power's plan to run a power line from Sahuarita to Nogales. Please enter them into the record.

- 1 I am opposed to any such power line in such a beautiful area. The desert plants along that corridor are a GARDEN. After a rain there are wildflowers. There are cactus plants and other desert species.
 - 2 Electrical transmission, in this day + age, is not efficient. With hydrogen power + fuel cells + solid hydrogen + wind + solar power there should be no need for long transmission lines. Power should be produced on site. Too much power is lost in transmission. It's a tremendous WASTE of land + energy.
 - 3 Please study other options for Nogales. And for helping Mexico (not this utility's responsibility) in other ways.
 - 4 Tribal lands must be protected.
- Thank you for accepting + considering my comments.

Sincerely,
Nancy Kroening
140 E. Paseo Chaparras
Green Valley AZ 85614

Comment No. 1

The Federal agencies note the commentator's opposition to the proposed transmission line because of the potential impact on the vegetation in the area.

Comment No. 2

Alternative or renewable power supply methods do not meet TEP's proposal and are thus not evaluated in this EIS (refer to section 2.1.5).

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Comment No. 3

Section 1.2 explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Any study of alternatives for "helping Mexico" would be outside the scope of the EIS.

Comment No. 4

Sections 3.4 and 4.4 discuss the existing cultural resources and analyze the potential impacts to these resources from the proposed project, including Native American Concerns. There are no reserved tribal lands in the proposed project; however, several tribes have traditional connections to the proposed project areas. Tribal concerns about the impacts of the transmission line on traditional use lands have been considered through consultation.

Kurtz, William
Page 1 of 1

DOE-EISCommentsDOE/EIS-0336,TEP Sahuarite-Nogales
Transmission Line DEIS

From: B & E Soporibell [SMTP:soporibell@msn.com]
To: Pell, Jerry
Cc:

Subject: DOE-EISCommentsDOE/EIS-0336,TEP Sahuarite-
Nogales Transmission Line DEIS
Sent: 10/14/2003 4:52 PM

Importance: Normal

Couple items not included in my verbal presentation:

1 The ACC order contains a condition that TEP use non-
reflective, colorized monopoles. The DEIS only mentions
self-weathering monopoles. Should the line be built TEP
should be required to use the non-reflective, colorized
monopoles as they would be less intrusive visually.

2 In additions to my verbal presentation on "roads" please note
the concern of invasive species taking advantage of the cleared
path--they are extremely difficult to control and we certainly
do not need them in the roadless-wilderness area.

William Kurtz,
65 Box 7990,
Amado AZ 85645.

Comment No. 1

ACC Decision No. 64356 (ACC 2002) uses the terms “non-reflective,” “self-weathering,” and “color suitable to the terrain and vegetation” to describe the structures that TEP should use. The self-weathering monopoles described in the EIS are intended to comply with these requirements of the ACC regarding structure finish.

Comment No. 2

Section 4.3.2, Biological Resources, states that the long-term reductions in biological activity (e.g., lack of vegetation in an area due to construction traffic) tend to be more pronounced in arid areas such as the proposed project area where biological communities recover very slowly from disturbances. Sections 3.3.3 and 4.3.3 presents analyses of the existing special interest species, and potential impacts to these species as a result of the proposed project. Section 3.3.2 discusses the existing vegetation and wildlife in the proposed project area, and Section 4.3 analyzes habitat fragmentation impacts.

Sections 3.3.6 and 4.3.6 discuss the existing invasive species (nonnative plants) in the project area, and potential invasive species impacts that could result from the proposed project.

Kurtz, William
Page 1 of 2

Forwarded by Susan K Kozacek/R3/USDAFS on 10/16/2003
 06:04 PM -----
 "B & E Soporibell" <soporibell@msn.com>
 10/14/2003 01:13 PM

To: <skozacek@fs.fed.us>
 cc:
 Subject: DEIS, TEP Sahuarita-Nogales Transmission Line

<?xml:namespace prefix="v" /><?xml:namespace prefix="o" />

Attached is the statement I made to DOE at the hearing in Nogales. Some of those statements are pertinent to the Coronado National Forest. Please also consider the following additional comments:

- 1 | 1. TEP is required by the ACC to use non-reflective colorized monopoles and NOT the self-weathering type described in the DEIS. Should the line be built in the National Forest non-reflective colorized monopoles should be required.
- 2 | 2. Regardless of how many visual simulations are made the fact remains that the line will be a great visual intrusion on the Forest and certainly one that we do not need be it the western, cross-over or central route.
- 3 | 3. The line is truly incompatible with the roadless,wilderness character of the Forest. These areas are disappearing and we should not mar this one with transmission lines.
- 4 | 4. The attachment discusses roads but fails to mention that any new roads are prime places for invasive species to become established.

Comment No. 1

Refer to the response to Comment No. 1 in the previous submittal from William Kurtz.

Comment No. 2

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project.

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

Comment No. 3

Sections 3.1 and 4.1 discuss the existing land use, including Wilderness Areas and roadless designations, and analyze the potential impacts to these resources from the proposed project. Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts related to roads. Also, refer to the response to Center for Biological Diversity, Comment 9, regarding roadless area designations.

Comment No. 4

Section 4.3.2, Biological Resources, states that the long-term reductions in biological activity (e.g., lack of vegetation in an area due to construction traffic) tend to be more pronounced in arid areas such as the proposed project area where biological communities recover very slowly from disturbances. Section 3.3.2 discusses the existing vegetation and wildlife in the proposed project area. Sections 3.3.6 and 4.3.6 discuss the existing invasive species (nonnative plants) in the project area, and potential invasive species impacts that could result from the proposed project.

Kurtz, William

Page 2 of 2

- 5 | Because the ACC order for a second line to serve Nogales only needs to be a 115kv line and can be provided outside the Forest no compelling reasons exist to construct a 345kv line through the Forest. Of the four alternatives in the DEIS the NO ACTION alternative should be selected.

William Kurtz, HC
65 Box 7990,
Amado AZ 85645.

Comment No. 5

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project is a dual purpose and need of benefiting both southern Arizona and Mexico.

A smaller transmission line in lieu of the proposed 345-kV line (e.g., a 115-kV line) would not meet the international interconnection aspect of TEP's proposal. Therefore, this alternative is not evaluated in detail in this EIS (see Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Lancaster, Rodd
Page 1 of 2

DR. JERRY PELL
OFFICE OF FOSSIL ENERGY
U.S. DEPARTMENT OF ENERGY
WASHINGTON D.C. 20585

MY COMMENTS REGARDING THE TOXEN
ELECTRIC POWER SAHUARITA-NOGALES
TRANSMISSION LINE DEIS.

1 THE PREFERRED WESTERN ROUTE IS
THE LOWEST, MOST EXPENSIVE, AND MOST
ENVIRONMENTALLY DAMAGING OF ALL
ALTERNATIVES CONSIDERED. THE PREFERRED
ALTERNATIVE SLICES THROUGH A CITIZENS'
PROPOSED WILDERNESS AREA AND WOULD
FOREVER SCAR THE OUTSTANDING NATURAL
CHARACTERISTICS OF THE AREA.

2 THERE IS NO NEED STATED FOR A
345 KV LINE BY EITHER THE APPLICANT (TEP)
OR AGENCIES - BECAUSE MOST OF THE ENERGY
TRANSMITTED ON THE LINE WOULD NOT BENEFIT
3 SANTA CRUZ COUNTY WHICH IS THE 345KV,
AND NOT A SMALLER LINE, NEEDED?

Comment No. 1

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.1 and 4.1 present a description of the existing land use, and analyze potential impacts to these resources from the proposed project.

Comment No. 2

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." In an applicant-initiated process, such as TEP's proposed project, the range of reasonable alternatives analyzed in detail in the EIS is directly related to the applicant's purpose and need.

Comment No. 3

A smaller transmission line (e.g., 115-kV line) in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Lancaster, Rodd
Page 2 of 2

3
cont.

A SMALLER, LESS OBTRUSIVE POWERLINE, SUCH AS A 115 KV LINE WAS NOT CONSIDERED FOR ANY ROUTE. WHY NOT? A 115 KV LINE IS CHEAPER, CAN MORE EASILY BE BURIED IN SENSITIVE AREAS NEAR HOMES, AND WOULD SERVE THE LONG-TERM NEEDS OF SANTA CRUZ COUNTY.

4

I DO NOT SUPPORT THE PREFERRED ALTERNATIVE BECAUSE IT DOES NOT SERVE SANTA CRUZ COUNTY'S INTERESTS, AS ORIGINALLY INTENDED UNDER ACC ORDER 62011. IT IS AN UNNECESSARY ECONOMIC, ENVIRONMENTAL, AND CULTURAL BURDEN ON SOUTHERN ARIZONA.

5

PLEASE CONSIDER ISSUING A SUPPLEMENTAL TRAFFIC ENVIRONMENTAL IMPACT STATEMENT THAT PROPERLY ANALYZES REAL SOLUTIONS TO POWER NEEDS IN SANTA CRUZ COUNTY THAT INCLUDE A SMALLER POWERLINE OR LOCALLY RUN POWER PLANT.

COMMENTS OF:

RODD LANCASTER
TUCSON AUDUBON SOCIETY
ARIZONA RESIDENT SINCE
1976

Comment No. 4

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project is a dual purpose and need of benefiting both southern Arizona and Mexico.

Comment No. 5

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Lancaster, Rodd
Page 1 of 2

9/30/03

TO: SUE KOZACEK
Acting Forest Supervisor
Coronado National Forest
300 W. Congress

My comments regarding the Tucson
Electric Power Sahuarita-Nogales
Transmission Line DEIS and
needed Forest Plan Amendments.

"The Tumacacori and Atascosa
Mountains are an exceptional area for
primitive recreation. They bring
in people from out of state to
enjoy their beauty. The powerline
is incompatible with the natural
characteristics there.

I enjoy bird watching, hiking,
biking, canyoneering, tracking, picnicking,
and more in the area affected by the
powerline and would be negatively
affected by the construction of the
powerline in the Western or Crossover
Routes.

Comment No. 1

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities and analyze the potential impacts to these resources from the proposed project.

Sections 3.1.2 and 4.1.2 present analyses of existing recreational settings and activities, and potential impacts to recreation from the proposed project. Section 4.1.2 specifically evaluates impacts to ROS indicators such as remoteness and naturalness, both of which would have changes that are "inconsistent" with the existing ROS classes for much of the length of the Western and Crossover Corridors within the Coronado National Forest.

Comment No. 2

The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Coronado National Forest as a whole, not for individual land units or EMAs within the Coronado National Forest. Any authorization issued to implement the proposed project on the Coronado National Forest would contain terms and conditions to ensure road barrier effectiveness and maintenance, as appropriate. Based on these terms and conditions for ensuring the effectiveness of road closures, the proposed project is consistent with Forest Plan standards and guidelines for road density.

Comment No. 3

Sections 3.1 and 4.1 present a description of the existing land use, and analyze the potential impacts to these resources from the proposed project.

Lancaster, Rodd
Page 2 of 2

2 TEP PROPOSES TO BUILD OVER 20 NEW MILES OF ROAD FOR THE PREFERRED ROUTE. THE ROAD DENSITY IN THE TUMACACORI EMA IS ALREADY ABOVE ACCEPTABLE LIMITS AS SET FORTH IN THE CURRENT FOREST PLAN. MORE ROAD BUILDING, EVEN WITH ASSOCIATED CLOSURES (OFTEN UNSUCCESSFUL) WOULD BE IN VIOLATION OF THE FOREST PLAN.

3 I URGE YOU TO DENY THE SPECIAL USE PERMIT FOR THE PREFERRED ROUTE BECAUSE IT IS NOT COMPATIBLE WITH THE CURRENT USES OF THE AFFECTED AREA.

4 A FOREST PLAN AMENDMENT WOULD ONLY DECREASE THE ALREADY DWINDLING SUPPLY OF REMOTE RECREATIONAL EXPERIENCES IN THE REGION AND WOULD IMPACT MANY SENSITIVE WILDLIFE AND PLANT SPECIES THAT ARE AN IMPORTANT ASPECT OF OUR SOUTHERN ARIZONA NATURAL HERITAGE.

THANK,
RODD LANCASTER (Judson Andrew Society)
213 N. 9TH AV
TULSON AZ 85705

Comment No. 4

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities and analyze the potential impacts to these resources from the proposed project.

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project.

Landa, Hazel
Page 1 of 2

From: dryland2@aol.com
Sent: Thursday, October 09, 2003 9:02 PM
To: Pell, Jerry
Subject: Environmental Impact Statement for Tucson Electric Power's proposed 345 kilovolt powerline

Dr. Jerry Pell
U.S. Department of Energy, Office of Fossil Energy (FE-27)
1000 Independence Avenue. SW
Washington, DC 20585

Dear Dr. Pell,

1 I am writing to urge you to withdraw the current draft
Environmental Impact Statement for Tucson Electric Power's
proposed 345 kilovolt powerline. It sounds to me that Tucson
Electric Power is taking advantage of the agreement between
2 the Arizona Corporations Commission and the Citizens
Communication Company to make a lot of extra profit by
creating a more massive line than necessary so that it can
export electricity to Mexico.

In this rush to make profits as opposed to providing a needed
backup for Nogales and Santa Cruz County, they are
sacrificing the environment, a treasure for the rest of us and
the wildlife within it.

3 TEP's proposed "Western Route" and alternative "Crossover
Route" would carve through some of the most remote and wild
areas in Southeast Arizona, forever scarring the beautiful and
irreplaceable landscape of the Tumacacori Highlands. This
area contains several roadless areas as well as a citizen's
proposed Wilderness area home to black bears, Mexican

Comment No. 1

The Federal agencies note the commentor's suggestion that DOE withdraw the current Draft EIS.

Comment No. 2

Potential economic benefit to TEP from the proposed project is outside the scope of the EIS. (See response to the Border Power Plant Working Group, Comment 2.)

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." In an applicant-initiated process, such as TEP's proposed project, the range of reasonable alternatives analyzed in detail in the EIS is directly related to the applicant's purpose and need.

Comment No. 3

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Landa, Hazel
Page 2 of 2

3
cont. | spotted owls, lesser-long nosed bats and peregrine falcons as
| well as lesser known species such as the Sonora chub,
| Mexican vine snake, elegant trogon and the Gentry indigo
| bush. A jaguar was sighted in this area only two years ago.

4 | The important goal of providing fully reliable electrical
| service to the city of Nogales and Santa Cruz County must be
| achieved. Unfortunately, instead of building the small
| transmission line necessary to achieve this goal, TEP has
| proposed a massive, environmentally destructive, and
| extremely controversial powerline designed to export power to
| Mexico.

| The draft EIS is clearly inadequate, because it does not
| address important alternatives to TEP's powerline which
| would provide reliable service without destroying our
| environmental and cultural heritage, and which would not
| require huge increases to consumers' electricity bills.

5 | The recent blackout in the Northeast is an urgent reminder that
| our energy policy should be based on serving the public
| interest, not corporate private profits. I urge DOE to issue a
| new draft EIS which fully and rigorously explores all available
| options-including a local power plant and smaller power lines
| which would not serve Mexico-to meet the important public
| interest of providing reliable energy service to Santa Cruz
| County.

Sincerely,

HAZEL LANDA
3837 NY 2
CROPSEYVILLE, New York 12052

Comment No. 4

When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Comment No. 5

Potential economic benefit to TEP from the proposed project is outside the scope of the EIS.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)